

David H. Relkin

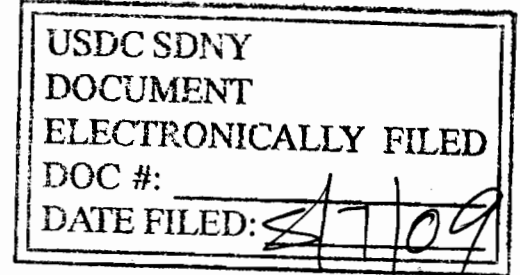
LAW OFFICES

David@RelkinLaw.com

575 Eighth Avenue
Suite 1706
New York, New York 10018-3049
(212) 244-8722

FAX
(212) 580-4409

July 30, 2009



BY FAX

Hon. Judge Barbara S. Jones
United States District Court
500 Pearl Street--Room 610
New York, New York 10007

Re: Leslie Dick Worldwide, Ltd. et al. v. George Soros, et al.;
Case No. 08 Civ. 7900 (BSJ) (THK) ECF

Hon. Judge Jones:

Briefly, Mr. Romano continues his deceptions and even stands behind them and his inappropriate remarks regarding the Complaint. He claims that plaintiffs have been given "extensive periods to respond," referencing the consensual agreement of the parties in Document No.107. Mr. Romano and Mr. Oller fail to advise Your Honor that Document 107 only gave plaintiffs 85 days to respond to defendants' motion while defendants were granted a 90 day extension by Your Honor in Document 35. *If plaintiffs' time was "extensive" it was clearly also "extensive" for defendants.*

As to Document No. 123, written by Mr. Oller himself, this was a consensual agreement in which both plaintiffs and defendants agreed that *the scheduling was reasonable for both sides*. Thus, by claiming the parties' consensual briefing schedule, memorialized in Document No. 123, was "extensive" he impugns his own agreement, and thus must again characterize the defendants' extension in that letter as similarly "extensive."¹

Incredibly, by failing to respond to plaintiffs' characterization of defendants' counsel Benito Romano and John Oller's false representations to Your Honor, they tacitly acknowledge the blatant misrepresentations to Your Honor on which You based Your denial of plaintiffs' request.

¹ That document 123, written by Mr. Oller himself, was a request for "extensive" additional time by plaintiffs is thus patently false.

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The only request prior to July 29 by plaintiffs was due to my torn ligaments and Mr. Dick's injuries and miraculous survival from riding as a passenger in car which went out of control before its head-on collision with at least three cars, ultimately crashing into a store on Madison Avenue at 90 miles per hour.

Finally, defendants completely ignore the patent lack of fairness due to the fact that plaintiffs' opposition papers are presently due on August 17, 2009—*a month prior to the earliest possible date that Phillips Nizer claims to be able to submit their motion to dismiss—September 15.*

Given the misrepresentations and omissions by defendants' counsel in their letter of yesterday (and today) on which Your Honor based Your denial of plaintiffs' request,² I respectfully renew plaintiffs' request that Your Honor grant plaintiffs' request for additional time to submit opposing papers to defendants' motions until September 30, 2009—only fifteen days after Phillips Nizer submits its first motion to dismiss.

Respectfully submitted,

David H. Relkin

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DHR\das
cc: Hon. Magistrate Katz
Mr. Leslie Dick
All counsel (via Email)

APPLICATION DENIED.

SO ORDERED
Dated:

Barbara S. Jones
BARBARA S. JONES
U.S.D.J.

8-7-09

² Mr. Romano's letter of today also fails to withdraw his patently improper and scurrilous characterization of the complaint in connection with plaintiffs' request for a reasonable adjournment.